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Attorney for Respondent

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF ALASKA

JON ARNOLD WOODARD,)	
)	
Petitioner,)	Case No. 3:05-cv-00089- TMB-JDR
)	
vs.)	<u>AFFIDAVIT SUPPORTING</u>
)	<u>UNOPPOSED MOTION FOR 30-</u>
JOHN CRAIG TURNBULL,)	<u>DAY EXTENSION OF TIME IN</u>
)	<u>WHICH TO FILE OBJECTIONS TO</u>
)	<u>MAGISTRATE JUDGE'S</u>
Respondent.)	<u>RECOMMENDATIONS</u>
)	(On Shortened Time)

STATE OF ALASKA)
) ss.
THIRD JUDICIAL DISTRICT)

W. H. Hawley, being first duly sworn, deposes and states:

1. I represent the respondent.

2. When this court's recommendations were received on May 29, 2007, I was working on the state's brief in *State v. Forster/Forster v. State*, A-9470/9490, cases pending in the Alaska Court of Appeals.

3. The state has received substantial extensions in *Forster*, and the state's brief is presently due on July 16, 2007. Forster's brief is 50 pages long. He argues that the trial judge erroneously failed to suppress lengthy statements he made concerning the murder of a police officer. The appeal is complicated by the fact that the transcripts of the statements and audio recording to which the undersigned has listened are both of poor quality. The case also involves a cross-appeal in which the state expects to argue that the case should be remanded for the imposition of a stiffer sentence because the present sentence is believed to be illegal. I have written 55 pages of a draft brief for *Forster* so far, but have only addressed one of several legal arguments. (I have done varying amounts of research on what I expect the issues are.) I expect I will need until July 16th to write the state's brief and to have it edited.

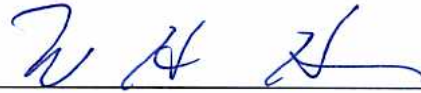
4. I am also assigned to respond to petitions for hearing in *Huffman v. State*, S-12521, in which the state asked for an extension until July 2, 2007, and *Edwards v. State*, in which the state asked for an extension until July 20, 2007, and for additional merit and one supplemental brief.

5. I am also responsible for the state's brief in *Harris v. State*, A-9548. I received a non-routine 92-day extension and have asked for a 60-day non-

routine extension. If it is granted, the state's brief will be due on August 10, 2007. Harris's brief is 50 pages long, it is expected that it will take a substantial effort to respond in the time I have requested. I am of course also responsible for several additional merit and one supplemental brief in the Alaska Court of Appeals, some of which have also been extended.

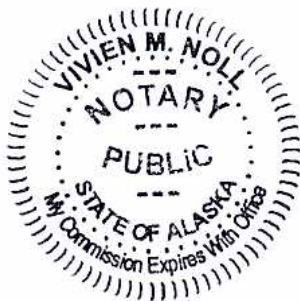
6. I have spoken to opposing counsel, Hugh Fleisher, and have received a phone message from him. He does not oppose this request and asks that the petitioner's deadline for objections be extended 30 days as well.


Further your affiant sayeth naught.



SUBSCRIBED AND SWORN to before me this 25th day of June,

2007.




Notary Public in and for Alaska